



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 29, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Pigeon Telephone Company  
Study Area Code 310721**

Dear Ms. Dortch:

On behalf of Pigeon Telephone Company (“Pigeon”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> Pigeon seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 29, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Pigeon Telephone Company  
Study Area Code 310721  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Pigeon Telephone Company (“Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name: Person USAC should contact with questions about this data         | Barb Main       |
| <035> | Contact Telephone Number:<br>Number of the person identified in data line <030> | 9894534258 ext. |
| <039> | Contact Email Address:<br>Email of the person identified in data line <030>     | bmain@avci.net  |

| ANNUAL REPORTING FOR ALL CARRIERS |   | 54.313<br>Completion<br>Required    | 54.422<br>Completion<br>Required    |
|-----------------------------------|---|-------------------------------------|-------------------------------------|
|                                   |   | (check box when complete)           |                                     |
| <100>                             | Service Quality Improvement Reporting (complete attached worksheet)   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <200>                             | Outage Reporting (voice) (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210>                             | <input checked="" type="checkbox"/> <-- check box if no outages to report   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <300>                             | Unfulfilled Service Requests (voice) 0  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <310>                             | Detail on Attempts (voice) (attach descriptive document)  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <320>                             | Unfulfilled Service Requests (broadband) 0  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <330>                             | Detail on Attempts (broadband) (attach descriptive document)  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <400>                             | Number of Complaints per 1,000 customers (voice)  |                                     |                                     |
| <410>                             | Fixed 0.52  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420>                             | Mobile 0.0  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <430>                             | Number of Complaints per 1,000 customers (broadband)  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <440>                             | Fixed 0.0   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <450>                             | Mobile 0.0  | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <500>                             | Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510>                             | 310721mi510.pdf (attached descriptive document)   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600>                             | Functionality in Emergency Situations (check to indicate certification)   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610>                             | 310721mi610.pdf (attached descriptive document)   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700>                             | Company Price Offerings (voice) (complete attached worksheet)   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <710>                             | Company Price Offerings (broadband) (complete attached worksheet)   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <800>                             | Operating Companies and Affiliates (complete attached worksheet)  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900>                             | Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/> (if yes, complete attached worksheet)                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1000>                            | Voice Services Rate Comparability Certification Yes   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1010>                            | (attach descriptive document)   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1100>                            | Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification) | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <1110>                            | (complete attached worksheet)   | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1200>                            | Terms and Condition for Lifeline Customers (complete attached worksheet)  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

|        |                                   |                          |                          |
|--------|-----------------------------------|--------------------------|--------------------------|
| <2000> | (check to indicate certification) | <input type="checkbox"/> | <input type="checkbox"/> |
| <2005> | (complete attached worksheet)     | <input type="checkbox"/> | <input type="checkbox"/> |

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

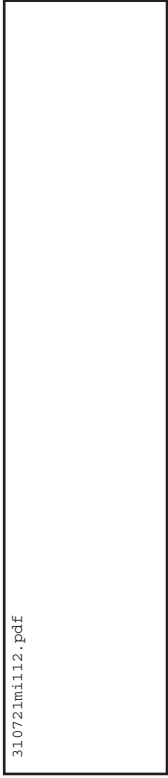
|        |                                   |                                     |                          |
|--------|-----------------------------------|-------------------------------------|--------------------------|
| <3000> | (check to indicate certification) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <3005> | (complete attached worksheet)     | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

|   |  |  |
|---|--|--|
| <b>(100) Service Quality Improvement Reporting Data Collection Form</b> |  | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|--|--|

|       |   |  |
|-------|---|--|
| <010> | Study Area Code   | 310721   |
| <015> | Study Area Name   | PIGEON TEL CO  |
| <020> | Program Year  | 2016   |
| <030> | Contact Name - Person USAC should contact regarding this data   | Barb Main  |
| <035> | Contact Telephone Number - Number of person identified in data line <030>   | 9894534258 ext.  |
| <039> | Contact Email Address - Email Address of person identified in data line <030>   | bmain@avci.net   |
| <110> | Has your company received its ETC certification from the FCC?<br>If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC? | <div> <input type="radio"/> (yes / no)                 </div> <div> <input checked="" type="radio"/> (yes / no)                 </div> |
| <111> |   | <div> <input type="radio"/> (yes / no)                 </div> <div> <input type="radio"/> (yes / no)                 </div>            |

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

|       |  |                |
|-------|--|----------------|
| <113> | Maps detailing progress towards meeting plan targets   | Yes            |
| <114> | Report how much universal service (USF) support was received   | Yes            |
| <115> | How much (USF) was used to improve service quality and how support was used to improve service quality   | Yes            |
| <116> | How much (USF) was used to improve service coverage and how support was used to improve service coverage | Yes            |
| <117> | How much (USF) was used to improve service capacity and how support was used to improve service capacity | Yes            |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year.                | Not Applicable |

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

bmain@avci.net

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|          |  |
|----------|--|
| 1/1/2015 |  |
|          |  |

|          |  |
|----------|--|
| 1/1/2015 |  |
|----------|--|

-- See attached worksheet





OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

Page 6

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

| Select<br>Yes or No or<br>Not Applicable |
|--|
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |
|  |

(1100) No Terrestrial Backhaul Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

|  |  |   |
|--|--|---|
| <b>(1200) Terms and Condition for Lifeline Customers</b> |  | FCC Form 481  |
| <b>Lifeline</b>  |  | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| <b>Data Collection Form</b>                              |  | July 2013   |

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

|        |  |                              |                           |
|--------|--|------------------------------|---------------------------|
| <1210> | Terms & Conditions of Voice Telephony Lifeline Plans | <div>310721mil1210.pdf</div> | Name of Attached Document |
| <1220> | Link to Public Website                               | HTTP                         |                           |

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

|        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

## (2000) Price Cap Carrier Additional Documentation

## Data Collection Form

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

|       |   |                                   |
|-------|---|-----------------------------------|
| <010> | Study Area Code   |                                   |
| <015> | Study Area Name   | 310721                            |
| <020> | Program Year  | PIGEON TEL CO                     |
| <030> | Contact Name - Person USAC should contact regarding this data                 | 2016                              |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | Hard Main                         |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | 9894334256 ext.<br>Dmail@avci.net |

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

## Incremental Connect America Phase I reporting

|         |  |
|---------|--|
| <2010>  | 2nd Year Certification {47 CFR § 54.313(b)(1)ii} |
| <2011a> | 3rd Year Certification {47 CFR § 54.313(b)(1)ii} |
| <2011b> | Attachment {47 CFR § 54.313(b)(1)ii}             |

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

|        |  |
|--------|--|
| <2012> | 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}            |
| <2013> | 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}            |
| <2014> | 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}            |
| <2015> | 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)} |

## Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

| <2016> | Certification Support Used to Build Broadband |
|--------|---|
|        |   |

## Connect America Phase II Reporting {47 CFR § 54.313(e)}

|  |
|--|
| 3rd year Broadband Service Certification<br><2017> |
| 5th year Broadband Service Certification<br><2018> |
| Interim Progress Certification<br><2019>           |

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

|        |  |
|--------|--|
| <2021> | Interim Progress Community Anchor Institutions |
|--------|--|

| Name of Attached Document(s) | Listing Required | Information Required |
|------------------------------|------------------|----------------------|
| 1. <u>2015-2016</u>          |                  |                      |
| 2. <u>2016-2017</u>          |                  |                      |
| 3. <u>2017-2018</u>          |                  |                      |
| 4. <u>2018-2019</u>          |                  |                      |
| 5. <u>2019-2020</u>          |                  |                      |
| 6. <u>2020-2021</u>          |                  |                      |
| 7. <u>2021-2022</u>          |                  |                      |
| 8. <u>2022-2023</u>          |                  |                      |
| 9. <u>2023-2024</u>          |                  |                      |
| 10. <u>2024-2025</u>         |                  |                      |
| 11. <u>2025-2026</u>         |                  |                      |
| 12. <u>2026-2027</u>         |                  |                      |
| 13. <u>2027-2028</u>         |                  |                      |
| 14. <u>2028-2029</u>         |                  |                      |
| 15. <u>2029-2030</u>         |                  |                      |
| 16. <u>2030-2031</u>         |                  |                      |
| 17. <u>2031-2032</u>         |                  |                      |
| 18. <u>2032-2033</u>         |                  |                      |
| 19. <u>2033-2034</u>         |                  |                      |
| 20. <u>2034-2035</u>         |                  |                      |
| 21. <u>2035-2036</u>         |                  |                      |
| 22. <u>2036-2037</u>         |                  |                      |
| 23. <u>2037-2038</u>         |                  |                      |
| 24. <u>2038-2039</u>         |                  |                      |
| 25. <u>2039-2040</u>         |                  |                      |
| 26. <u>2040-2041</u>         |                  |                      |
| 27. <u>2041-2042</u>         |                  |                      |
| 28. <u>2042-2043</u>         |                  |                      |
| 29. <u>2043-2044</u>         |                  |                      |
| 30. <u>2044-2045</u>         |                  |                      |
| 31. <u>2045-2046</u>         |                  |                      |
| 32. <u>2046-2047</u>         |                  |                      |
| 33. <u>2047-2048</u>         |                  |                      |
| 34. <u>2048-2049</u>         |                  |                      |
| 35. <u>2049-2050</u>         |                  |                      |
| 36. <u>2050-2051</u>         |                  |                      |
| 37. <u>2051-2052</u>         |                  |                      |
| 38. <u>2052-2053</u>         |                  |                      |
| 39. <u>2053-2054</u>         |                  |                      |
| 40. <u>2054-2055</u>         |                  |                      |
| 41. <u>2055-2056</u>         |                  |                      |
| 42. <u>2056-2057</u>         |                  |                      |
| 43. <u>2057-2058</u>         |                  |                      |
| 44. <u>2058-2059</u>         |                  |                      |
| 45. <u>2059-2060</u>         |                  |                      |
| 46. <u>2060-2061</u>         |                  |                      |
| 47. <u>2061-2062</u>         |                  |                      |
| 48. <u>2062-2063</u>         |                  |                      |
| 49. <u>2063-2064</u>         |                  |                      |
| 50. <u>2064-2065</u>         |                  |                      |
| 51. <u>2065-2066</u>         |                  |                      |
| 52. <u>2066-2067</u>         |                  |                      |
| 53. <u>2067-2068</u>         |                  |                      |
| 54. <u>2068-2069</u>         |                  |                      |
| 55. <u>2069-2070</u>         |                  |                      |
| 56. <u>2070-2071</u>         |                  |                      |
| 57. <u>2071-2072</u>         |                  |                      |
| 58. <u>2072-2073</u>         |                  |                      |
| 59. <u>2073-2074</u>         |                  |                      |
| 60. <u>2074-2075</u>         |                  |                      |
| 61. <u>2075-2076</u>         |                  |                      |
| 62. <u>2076-2077</u>         |                  |                      |
| 63. <u>2077-2078</u>         |                  |                      |
| 64. <u>2078-2079</u>         |                  |                      |
| 65. <u>2079-2080</u>         |                  |                      |
| 66. <u>2080-2081</u>         |                  |                      |
| 67. <u>2081-2082</u>         |                  |                      |
| 68. <u>2082-2083</u>         |                  |                      |
| 69. <u>2083-2084</u>         |                  |                      |
| 70. <u>2084-2085</u>         |                  |                      |
| 71. <u>2085-2086</u>         |                  |                      |
| 72. <u>2086-2087</u>         |                  |                      |
| 73. <u>2087-2088</u>         |                  |                      |
| 74. <u>2088-2089</u>         |                  |                      |
| 75. <u>2089-2090</u>         |                  |                      |
| 76. <u>2090-2091</u>         |                  |                      |
| 77. <u>2091-2092</u>         |                  |                      |
| 78. <u>2092-2093</u>         |                  |                      |
| 79. <u>2093-2094</u>         |                  |                      |
| 80. <u>2094-2095</u>         |                  |                      |
| 81. <u>2095-2096</u>         |                  |                      |
| 82. <u>2096-2097</u>         |                  |                      |
| 83. <u>2097-2098</u>         |                  |                      |
| 84. <u>2098-2099</u>         |                  |                      |
| 85. <u>2099-2100</u>         |                  |                      |
| 86. <u>2100-2101</u>         |                  |                      |
| 87. <u>2101-2102</u>         |                  |                      |
| 88. <u>2102-2103</u>         |                  |                      |
| 89. <u>2103-2104</u>         |                  |                      |
| 90. <u>2104-2105</u>         |                  |                      |
| 91. <u>2105-2106</u>         |                  |                      |
| 92. <u>2106-2107</u>         |                  |                      |
| 93. <u>2107-2108</u>         |                  |                      |
| 94. <u>2108-2109</u>         |                  |                      |
| 95. <u>2109-2110</u>         |                  |                      |
| 96. <u>2110-2111</u>         |                  |                      |
| 97. <u>2111-2112</u>         |                  |                      |
| 98. <u>2112-2113</u>         |                  |                      |
| 99. <u>2113-2114</u>         |                  |                      |
| 100. <u>2114-2115</u>        |                  |                      |
| 101. <u>2115-2116</u>        |                  |                      |
| 102. <u>21</u>               |                  |                      |

|  |  |
|--|--|
| (3000) Rate Of Return Carrier Additional Documentation |  |
| Data Collection Form                                   |  |
| FCC Form 481   |  |
| OMB Control No. 3060-0986/OMB Control No. 3060-0819    |  |
| July 2013  |  |

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

|        |   |                  |
|--------|---|------------------|
| (3010) | Progress Report on 5 Year Plan                      |                  |
|        | Milestone Certification (47 CFR § 54.313(f)(1)(ii)) | 310721mi3010.pdf |

|        |  |                                     |
|--------|--|-------------------------------------|
| (3011) | Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. | <input checked="" type="checkbox"/> |
|--------|--|-------------------------------------|

|        |   |                  |
|--------|---|------------------|
| (3012) | Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) | 310721mi3012.pdf |
|--------|---|------------------|

|        |  |                          |
|--------|--|--------------------------|
| (3013) | Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) | <input type="checkbox"/> |
| (3014) | If yes, does your company file the RUS annual report                 | <input type="checkbox"/> |

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

|        |   |                          |
|--------|---|--------------------------|
| (3015) | Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) | <input type="checkbox"/> |
| (3016) | Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows                     | <input type="checkbox"/> |

|        |   |                  |
|--------|---|------------------|
| (3017) | If the response is yes on line 3014, attach your company's RUS annual report and all required documentation | 310721mi3026.pdf |
|--------|---|------------------|

|        |  |                          |
|--------|--|--------------------------|
| (3018) | If the response is no on line 3014, Is your company audited? | <input type="checkbox"/> |
|--------|--|--------------------------|

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

|        |   |                                     |
|--------|---|-------------------------------------|
| (3019) | Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications | <input checked="" type="checkbox"/> |
|--------|---|-------------------------------------|

|        |   |                                     |
|--------|---|-------------------------------------|
| (3020) | Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | <input checked="" type="checkbox"/> |
|--------|---|-------------------------------------|

|        |  |                                     |
|--------|--|-------------------------------------|
| (3021) | Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit | <input checked="" type="checkbox"/> |
|--------|--|-------------------------------------|

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

|        |  |                          |
|--------|--|--------------------------|
| (3022) | Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications | <input type="checkbox"/> |
|--------|--|--------------------------|

|        |  |                          |
|--------|--|--------------------------|
| (3023) | Underlying information subjected to a review by an independent certified public accountant | <input type="checkbox"/> |
|--------|--|--------------------------|

|        |   |                          |
|--------|---|--------------------------|
| (3024) | Underlying information subjected to an officer certification. | <input type="checkbox"/> |
|--------|---|--------------------------|

|        |   |                          |
|--------|---|--------------------------|
| (3025) | Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | <input type="checkbox"/> |
|--------|---|--------------------------|

|        |   |                  |
|--------|---|------------------|
| (3026) | Attach the worksheet listing required information | 310721mi3026.pdf |
|--------|---|------------------|

Name of Attached Document Listing Required Information

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

|   |  |
|---|--|
| Financial Data Summary                  |  |
| (3027) Revenue                          |  |
| (3028) Operating Expenses               |  |
| (3029) Net Income                       |  |
| (3030) Telephone Plant In Service(TPIS) |  |
| (3031) Total Assets                     |  |
| (3032) Total Debt                       |  |
| (3033) Total Equity                     |  |
| (3034) Dividends                        |  |



|   |  |
|---|--|
| <b>Certification - Reporting Carrier<br/>Data Collection Form</b> | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|--|

|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGEON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

|   |                                |
|---|--------------------------------|
| <b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>   |                                |
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. |                                |
| Name of Reporting Carrier:  |                                |
| Signature of Authorized Officer:  | Date                           |
| Printed name of Authorized Officer:   |                                |
| Title or position of Authorized Officer:  |                                |
| Telephone number of Authorized Officer:   |                                |
| Study Area Code of Reporting Carrier:   | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.  |                                |

|   |  |
|---|--|
| <b>Certification - Agent / Carrier<br/>Data Collection Form</b> | FCC Form 481<br>OMB Control No. 3060-0986/OMB Control No. 3060-0819<br>July 2013 |
|---|--|

|   |                 |
|---|-----------------|
| <010> Study Area Code   | 310721          |
| <015> Study Area Name   | PIGEON TEL CO   |
| <020> Program Year  | 2016            |
| <030> Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> Contact Telephone Number - Number of person identified in data line <030>     | 9894534258 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

|  |  |
|--|--|
| <b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>   |  |
| I certify that (Name of Agent) <u>John Staurulakis Inc</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. |  |
| Name of Authorized Agent:  | John Staurulakis Inc                             |
| Name of Reporting Carrier:   | PIGEON TEL CO                                    |
| Signature of Authorized Officer:   | CERTIFIED ONLINE Date: 06/27/2015                |
| Printed name of Authorized Officer:  | Neal Eichler                                     |
| Title or position of Authorized Officer:   | Vice President                                   |
| Telephone number of Authorized Officer:  | 9894534391 ext.                                  |
| Study Area Code of Reporting Carrier:  | 310721 Filing Due Date for this form: 07/01/2015 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.   |  |

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

|  |  |
|--|--|
| <b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>  |  |
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. |  |
| Name of Reporting Carrier:   | PIGEON TEL CO                                    |
| Name of Authorized Agent or Employee of Agent:   | JSI  |
| Signature of Authorized Agent or Employee of Agent:  | CERTIFIED ONLINE Date: 06/27/2015                |
| Printed name of Authorized Agent or Employee of Agent:   | Cassandra Heyne                                  |
| Title or position of Authorized Agent or Employee of Agent:  | Consultant                                       |
| Telephone number of Authorized Agent or Employee of Agent:   | 3014597590 ext.                                  |
| Study Area Code of Reporting Carrier:  | 310721 Filing Due Date for this form: 07/01/2015 |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.   |  |

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

## **Pigeon Telephone Company's Demonstration of Complying with Service Quality Standards and Consumer Protection Rules for Voice and Broadband Services**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Pigeon Telephone Company (“Company”) hereby certifies that it is complying with state and federal service quality standards and consumer protection rules. The Company is subject to consumer protection obligations for voice services under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Michigan Public Service Commission (MPSC), as specified in Section 202(b) of the Michigan Telecommunications Act (MTA) and MPSC Case No. U-11103, which disclose rates, terms and conditions of service to customers; (2) adherence to Michigan state consumer protection requirements governing telephone providers, Prohibitions as identified in Sections 305 and 502 of the MTA, Costing

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

Procedures as determined by the MPSC in Case No. U-11103, and Compliance with Anti-Slamming Procedures as adopted in MPSC Case No. U-11757 and Case No. U-11900; and (3) CPNI, Red Flag Rules and other federal and state requirements governing the protection of customers' privacy.

As an incumbent licensed local exchange carrier in Michigan, the Company has operated for many years in the telecommunications industry, an industry that has had varying degrees of regulation. The Company's long-time operations in this regulated industry have made it aware of applicable standards and rules. The Company periodically reviews and stays abreast of changes in standards and rules. The Company is a member of a state industry association that monitors these changes and provides information to its members. The Company also hires consultants and attorneys to assist when reasonable or necessary.

As a licensed telecommunications carrier in Michigan, the Company is subject to the Michigan Telecommunications Act (MTA), MCL 484.2101 *et seq.*, and the jurisdiction of the Michigan Public Service Commission (MPSC). The Company must comply with the numerous obligations relating to telecommunications service set out in the MTA and rules the MPSC has adopted under the MTA, the federal Communications Act as amended (FTA), and rules the FCC has adopted under the FTA; and the Company must comply with generally applicable state consumer protection laws.

The Company's obligations include: (1) filing a local exchange service tariff pursuant to the requirements of the MPSC in accordance with section 202(b) of the MTA, MCL 484.202(b), that complies with cost and rate rules stated in the MTA and the MPSC's orders, including the order in MPSC Case No. U-11103 (June 5, 1996), which discloses the rates and terms of service to customers; (2) complying with Michigan's consumer protection law,

MCL 445.901 *et seq.*; complying with the MTA's consumer-oriented conduct requirements set forth in MCL 484.2502, which prohibit, among other things, false, deceptive or misleading statements, cramming, inappropriate charges, causing a probability of confusion, misleading representations regarding the delivery of service, and certain disconnections; (4) complying with Michigan Anti-Slamming Procedures, including those in the MTA, MCL 484.2305, and related rules the MPSC adopted, such as those adopted in Orders in MPSC Case Nos. U-11757 and U-11900; (5) complying with state and federal requirements regarding E 9-1-1 service, basic local exchange service and related matters per Section 2305b(c) of the MTA, MCL 484.2305b(c); and (6) complying with state and federal requirements relating to protecting customers' privacy, including state and federal requirements as to confidential proprietary network information (CPNI) and identity theft.

The Company has consistently taken action to ensure compliance with all of the above by, among other things, the following: it has filed a local exchange service tariff with the MPSC commitment to objective measures to protect consumers.” *Id.* at para. 28. The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis in accordance with MPSC rules, and that tariff is readily available to customers on line; it has trained its customer service representatives to explain to customers rates, charges, terms and conditions of service, available programs and to furnish customers with reasonable access to information and assistance and the like; it has trained its customer service representatives to interact with customers respectfully and in accordance with consumer protections; it maintains a business office adequately staffed with qualified persons to assist customers; it notifies its customers of their rights; it notifies its

customers regarding the \*67 feature and similar functions; it notifies its customers of the Do-Not-Call list and how to participate; it provides directories to customers containing information about programs, rights and responsibilities, and \*67 service, among other things (a copy is available in prior state ETC filings); it has adopted an Identity Theft Prevention Policy (a compliance manual and operating procedures—a copy is available in prior state ETC filings) consistent with all applicable “Red Flag” rules; it passes through to its customers all state and federal Lifeline and Link-up discounts, and notifies its customers of the Lifeline program and how to apply if eligible; it has adopted a CPNI compliance manual and operating procedures (a copy is available in prior state ETC filings) consistent with all applicable laws, conducts employee CPNI training, and provides access to CPNI rules in its business office. Also, the Company has certified to the FCC that it complies with the FCC’s CPNI rules.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.



**Pigeon Telephone Company's Demonstration of Ability to Function in  
Emergency Situations:**

Pigeon Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and the Michigan Telecommunications Act (MTA). The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites in accordance with the specifications identified in Section 305c(a) of the MTA, 484.2305c Emergency power requirements; compliance.

---

<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

The Company has back-up battery reserve in its central office, which enables it to provide service for a minimum of 8 hours, allowing it to function in an emergency situation without an external power source. It also has a standby generator and mobile power units, which can be taken to outside cabinets when needed. Together, the generators and battery back-up enable the Company's central offices to keep running until power is restored (so long as fuel is available), or until system changes are made to re-route traffic.

The Company has redundancy in its network to use in rerouting traffic when its facilities are damaged. The Company also can change call routing translations as needed to re-route traffic around damaged facilities.

The Company's network is engineered to provide maximum capacity in order to manage traffic spikes resulting from an emergency situation. By having back-up power ready and available and having redundancy, all of the Company's facilities are able to keep traffic moving and connecting so as to manage any traffic spikes that may arise from emergency situations.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.



|       |   |                 |
|-------|---|-----------------|
| <010> | Study Area Code   | 310721          |
| <015> | Study Area Name   | PIGBON TEL CO   |
| <020> | Program Year  | 2016            |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main       |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534391 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net  |

[illegible]

(800) Operating Companies  
Data Collection Form

|       |   |                                  |
|-------|---|----------------------------------|
| <010> | Study Area Code   | 310721                           |
| <015> | Study Area Name   | PIGEON TEL CO                    |
| <020> | Program Year  | 2016                             |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Barb Main                        |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 9894534391 ext.                  |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | bmain@avci.net                   |
| <810> | Reporting Carrier   | Pigeon Telephone Company         |
| <811> | Holding Company   | Agri-Valley Communications, Inc. |
| <812> | Operating Company   | Pigeon Telephone Company         |

[illegible]

**LIFELINE APPLICATION**

Eligible customers will receive \$11.25 off their monthly phone bill  
and seniors aged 65 and older can receive additional discounts.

**TOLL FREE 1-866-321-2323**

To apply for Lifeline Service, complete the application below and send it to:

**Lifeline Administration Service**

**PO Box 11037, Lansing, Michigan 48901 OR fax to 517-482-3548**

**IDENTIFICATION INFORMATION (PLEASE PRINT)**

|                           |  |                        |  |
|---------------------------|--|------------------------|--|
| Applicant's phone number: |  | Name of phone company: |  |
| Date of Birth:            | Last 4-digits of Social Security Number: |                        |  |
| Last Name:                | First Name:                              | M.I.:                  |  |
| Street:                   |  |                        |  |

**Residential street address only; FCC regulations prohibit the use of P.O. Boxes for the Lifeline program**

|   |        |           |
|---|--------|-----------|
| City:   | State: | ZIP Code: |
| This is my permanent address: Yes <input type="checkbox"/> No <input type="checkbox"/> This is a rural address with no postal route: Yes <input type="checkbox"/> No <input type="checkbox"/> |        |           |
| Billing Address, City, State and Zip Code (if different from Service Address)   |        |           |

There are multiple unique households (e.g. nursing home, assisted living facility) at my address, as defined in this program.

YES ☐

NO ☐

**PROGRAM QUALIFICATION INFORMATION**

To be eligible for Lifeline discounts, regulations require you to qualify via one of the two methods below. Please fill out one section only.

**Method 1. My income is within the guidelines and I am providing the following photocopies that document my total household income, which is stated below. Please check all that apply.**

**TOTAL MONTHLY INCOME: \$**

**NUMBER OF HOUSEHOLD MEMBERS:**

| # of Household Members   | Gross Monthly Income | Gross Annual Income* |
|--|----------------------|----------------------|
| 1  | \$1,471              | \$17,655             |
| 2  | \$1,991              | \$23,895             |
| 3  | \$2,511              | \$30,135             |
| 4  | \$3,031              | \$36,375             |
| *Add \$6,240 (\$520 monthly) for each additional household member. |                      |                      |

|   |   |
|---|---|
| <input type="checkbox"/> Prior year's state or federal tax return.                | <input type="checkbox"/> Current Annual Income Statement from Employer  |
| <input type="checkbox"/> Social Security statement of benefits                    | <input type="checkbox"/> Paycheck stubs or other official document containing income information for any 3 consecutive months within last 12 months |
| <input type="checkbox"/> Retirement/pension statement of benefits                 | <input type="checkbox"/> Veterans Administration statement of benefits  |
| <input type="checkbox"/> Unemployment/Worker's Compensation Statement of Benefits | <input type="checkbox"/> Divorce decree or child support document containing income information   |

**Method 2. I, or the member of my household named below, receives assistance from one of the listed programs. I am providing documentation of participation in the checked program.**

**Name:** \_\_\_\_\_

|   |   |
|---|---|
| <input type="checkbox"/> Food stamps                          | <input type="checkbox"/> Federal Public Housing Assistance or Section 8 |
| <input type="checkbox"/> Medicaid                             | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Supplemental Security Income         | <input type="checkbox"/> National School Lunch – Free Lunch Program     |
| <input type="checkbox"/> Low-Income Home Energy Plan (LIHEAP) |   |

**LIFELINE ADMINISTRATION SERVICE PROCESSES APPLICATIONS FOR THE FOLLOWING COMPANIES**

|                                  |                                   |                                    |
|----------------------------------|-----------------------------------|------------------------------------|
| AcenTek                          | Climax Telephone Company          | Springport Telephone Company       |
| Allband Communications Coop.     | Deerfield Farmers' Telephone Co.  | TDS Telecom                        |
| Baraga Telephone Company         | Hiawatha Telephone Company        | Thumb Cellular                     |
| Barry County Telephone Company   | Kaleva Telephone Company          | Upper Peninsula Telephone Company  |
| Blanchard Telephone Company      | Lennon Telephone Company          | Waldron Telephone Company          |
| Bloomington Communications       | Michigan Central Broadband Co.    | Westphalia Broadband, Inc./Comlink |
| Carr Telephone Company           | Midway Telephone Company          | Westphalia Telephone Company       |
| CenturyLink of Michigan          | Ogden Communications              | Winn Telecom                       |
| CenturyLink of Midwest Michigan  | Ontonagon County Telephone Co.    | Winn Telephone Company             |
| CenturyLink of Northern Michigan | Pigeon Telephone Company          |                                    |
| CenturyLink of Upper Michigan    | Sand Creek Telephone Company      |                                    |
| Chapin Telephone Company         | Southwest Michigan Communications |                                    |

**For more information, please call 1-866-321-2323.**

If your phone company is not on the list above, please contact them directly to apply for Lifeline discounts.

**APPLICANT ACKNOWLEDGEMENTS****PLEASE READ AND INITIAL EACH OF THE FOLLOWING STATEMENTS TO INDICATE THAT YOU UNDERSTAND AND AGREE:**

- I understand and consent to Lifeline Administration Service providing my Lifeline service account information, including but not limited to, my name, residential address, phone number, date of birth, the last 4 digits of my social security number, the date on which my Lifeline service was initiated/terminated, the amount of Lifeline support provided, and the means through which I qualified for Lifeline, to the Universal Service Administrative Company (USAC), USAC's agents and/or the National Lifeline Accountability Database to ensure the proper administration of the Lifeline program. I understand that if I fail to provide this consent, Lifeline Administration Service will deny me Lifeline service.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Lifeline support is only available for a single phone line at my principal residence and no one else in my household is receiving Lifeline discounts. (A "household" is defined as any individual or group of individuals who live together at the same address and share income and expenses.)
- Violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in the subscriber's de-enrollment from the program and potentially prosecution by the US government.
- I understand that if I am identified as receiving more than one Lifeline benefit, all telephone service providers involved may be notified so that I may select one service and be de-enrolled from the other(s).
- I will notify my telephone company within 30 days if I no longer qualify for Lifeline and I may be subject to penalties if I fail to do so.
- I will notify my telephone company within 30 days of any changes to my residential address.
- I will be required to certify my continued eligibility for Lifeline at least once a year and know failure to do so will result in termination of my participation in the program.

**APPLICANT SIGNATURE**

**I certify, under penalty of perjury, that the information provided in this application and supporting documentation is true and complete.**

Signature:

Date:

**REVISED 1/2015**

Pigeon Telephone Company  
M.P.S.C. No. 1 (R)

1<sup>st</sup> Revised Sheet No. 4  
Cancels Original Sheet No. 4

LOCAL TELEPHONE EXCHANGE SERVICE

INDEX OF INCORPORATED VILLAGES, TOWNSHIPS  
AND COUNTIES WITHIN ITS SERVICE EXCHANGE AREA

| <u>Exchange</u>   | <u>Incorporated Villages</u> | <u>Townships</u>   | <u>County</u>        |
|-------------------|------------------------------|--|----------------------|
| Alba              | None                         | Chestonia<br>Star<br>Hayes   | Antrim<br><br>Otsego |
| Lake of the North | None                         | Hayes<br>Mancelona<br>Star   | Otsego<br>Antrim     |
| Pigeon            | Pigeon                       | Winsor<br>Brook field<br>Chandler<br>Fair Haven<br>McKinley<br>Oliver<br>Caseville | Huron                |
| Twining           | Turner                       | Arenac<br>Turner   | Arenac               |
|                   | Twining                      | Mason  |                      |
|                   | None                         | Burleigh<br>Sherman  | Iosco                |

(C)

Issued: August 6, 2003

Effective: August 7, 2003

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan



Pigeon Telephone Company  
M.P.S.C. No. 1(R)

4th Revised Sheet No. 5  
Cancels 3rd Revised Sheet No. 5

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: PIGEON

## A GENERAL

1. The provision of service at the rates shown below is subject to the regulations given in the General Rules and Regulations as they now exist and are filed with and form part of this tariff.
2. The rates shown in Section B and C, following, entitle the customer to local calling to all stations bearing the designation of the following rates centers, which comprise the Local Calling Area: (C)

|          |          |             |           |            |          |       |     |
|----------|----------|-------------|-----------|------------|----------|-------|-----|
| BAD AXE  | BAY PORT | CASEVILLE   | CASS CITY | ELKTON     | GAGETOWN | KINDE | (N) |
| OWENDALE | PIGEON   | PORT AUSTIN | SEBEWAING | UNIONVILLE |          |       | (N) |

The company will block all 1+ calls dialed to any rate center listed in Section A 2, preceding. (N)

## B. MONTHLY RATES: Within the Base Rate Area: <sup>1</sup> (C)

| Class of Service        |         |     |
|-------------------------|---------|-----|
| Residence 1-Party Line  | \$22.55 | (I) |
| Business 1-Party Line   | \$27.11 | (I) |
| Private Branch Exchange | \$36.40 | (I) |

In addition to the MONTHLY RATES listed above, the LOCAL MOU RATES in Section C. apply. (N)

<sup>1</sup> Basic local exchange service installed after December 31,2001, will include touchcall service at no additional charge above the rates listed for the class of service installed. Residence 1-Party Line, Business 1-Party Line and Private Branch Exchange lines in service at January 1, 2002, that did not have touchcall service as an auxiliary service at the end of business December 31, 2001 will receive a monthly credit of \$1.25 during the period that line is in continual service after December 31, 2001 and touchcall service is not affirmatively added as an auxiliary service. If an end user's actions cause the disconnection of a line for any reason (such as nonpayment of a bill for regulated services, change of class of service or movement to vacation rate) that line will not qualify for any future touchcall service credit. (C)

(D)  
(D)

<sup>3</sup> EDUCATIONAL CREDIT A \$2.50 credit applies for each Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service provided to a public school. (C)  
(C)

<sup>4</sup> BUSINESS MULTI-LINE CREDIT A \$2.50 credit applies for Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service over six (6) (combined Private Branch Exchange and Business 1-Party Line services) provided to the same location and billed on the same bill. (C)  
(C)

<sup>5</sup> If both the EDUCATIONAL CREDIT and the BUSINESS MULTI-LINE CREDIT could apply, only the EDUCATIONAL CREDIT would apply. In this case, the BUSINESS MULTI-LINE CREDIT would not apply.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

Original Sheet No. 5.0.2

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: PIGEON

## C LOCAL MOU RATE

1. This charge applies in addition to the MONTHLY RATE listed in Section B, preceding.
2. For non 1+ and 0+ calls dialed to a station bearing the rate center designation of PIGEON, the Company will charge the following:

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period | \$0.00 per MOU |
|---|----------------|

|   |                |
|---|----------------|
| Each Conversation MOU over 2,000 in that billing period | \$0.00 per MOU |
|---|----------------|

3. For non 1+ and 0+ call dialed to a station within the Local Calling Area, but not to a station bearing the rate center designation of PIGEON, the Company will charge the following:

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period | \$0.00 per MOU |
|---|----------------|

|   |                |
|---|----------------|
| Each Conversation MOU over 2,000 in that billing period | \$0.05 per MOU |
|---|----------------|

4. The Company will measure Conversation MOU from the time the Company's switching equipment receives answer supervision to the earlier of when the Company's switch receives disconnection supervision from itself or from the terminating switch.
5. The Company will measure Conversation MOU to the next higher whole MOU per call.
6. The Company will not bill the end user for non-conversation time related to local calls.
7. Conversation MOU do not include 0-plus or 0-minus calls.
8. The Company will not provide call record detail for local usage as part of its LOCAL TELEPHONE EXCHANGE SERVICE.
9. No MOU are carried forward from month to month.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

4th Revised Sheet No. 5.1  
Cancels 3rd Revised Sheet No. 5.1

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: TWINING

## A GENERAL

1. The provision of service at the rates shown below is subject to the regulations given in the General Rules and Regulations as they now exist and are filed with and form part of this tariff.
2. The rates shown in Section B and C, following, entitle the customer to local calling to all stations bearing the designation of the following rates centers, which comprise the Local Calling Area: (C)

AU GRES EAST TAWAS OMER PRESCOTT TWINING WHITEMORE (N)

The company will block all 1+ calls dialed to any rate center listed in Section A 2, preceding. (N)

## B. MONTHLY RATES: Within the Base Rate Area: <sup>1</sup> (C)

| Class of Service        |         |     |
|-------------------------|---------|-----|
| Residence 1-Party Line  | \$21.07 | (I) |
| Business 1-Party Line   | \$23.37 | (I) |
| Private Branch Exchange | \$26.30 | (I) |

In addition to the MONTHLY RATES listed above, the LOCAL MOU RATES in Section C. apply. (N)

<sup>1</sup> Basic local exchange service installed after December 31, 2001, will include touchcall service at no additional charge above the rates listed for the class of service installed. Residence 1-Party Line, Business 1-Party Line and Private Branch Exchange lines in service at January 1, 2002, that did not have touchcall service as an auxiliary service at the end of business December 31, 2001 will receive a monthly credit of \$1.25 during the period that line is in continual service after December 31, 2001 and touchcall service is not affirmatively added as an auxiliary service. If an end user's actions cause the disconnection of a line for any reason (such as nonpayment of a bill for regulated services, change of class of service or movement to vacation rate) that line will not qualify for any future touchcall service credit. (C)

(D)

(D)

<sup>3</sup> EDUCATIONAL CREDIT A \$2.50 credit applies for each Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service provided to a public school. (C)

(C)

<sup>4</sup> BUSINESS MULTI-LINE CREDIT A \$2.50 credit applies for Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service over six (6) (combined Private Branch Exchange and Business 1-Party Line services) provided to the same location and billed on the same bill. (C)

(C)

(C)

<sup>5</sup> If both the EDUCATIONAL CREDIT and the BUSINESS MULTI-LINE CREDIT could apply, only the EDUCATIONAL CREDIT would apply. In this case, the BUSINESS MULTI-LINE CREDIT would not apply.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

Original Sheet No. 5.1.2

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: TWINING

## C LOCAL MOU RATES

1. This charge applies in addition to the MONTHLY RATES listed in Section B, preceding.
2. For non 1+ and 0+ calls dialed to a station bearing the rate center designation of TWINING, the Company will charge the following:

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period | \$0.00 per MOU |
|---|----------------|

|   |                |
|---|----------------|
| Each Conversation MOU over 2,000 in that billing period | \$0.00 per MOU |
|---|----------------|

3. For non 1+ and 0+ call dialed to a station within the Local Calling Area, but not to a station bearing the rate center designation of TWINING, the Company will charge the following:

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period | \$0.00 per MOU |
|---|----------------|

|   |                |
|---|----------------|
| Each Conversation MOU over 2,000 in that billing period | \$0.05 per MOU |
|---|----------------|

4. The Company will measure Conversation MOU from the time the Company's switching equipment receives answer supervision to the earlier of when the Company's switch receives disconnection supervision from itself or from the terminating switch.
5. The Company will measure Conversation MOU to the next higher whole MOU per call.
6. The Company will not bill the end user for non-conversation time related to local calls.
7. Conversation MOU do not include 0-plus or 0-minus calls.
8. The Company will not provide call record detail for local usage as part of its LOCAL TELEPHONE EXCHANGE SERVICE.
9. No MOU are carried forward from month to month.

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Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

4th Revised Sheet No. 5.2  
Cancels 3rd Revised Sheet No. 5.2

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: ALBA

## A GENERAL

1. The provision of service at the rates shown below is subject to the regulations given in the General Rules and Regulations as they now exist and are filed with and form part of this tariff.
2. The rates shown in Section B and C, following, entitle the customer to local calling to all stations bearing the designation of the following rates centers, which comprise the Local Calling Area: (C)

ALBA BELLAIRE GAYLORD ELMIRA EAST JORDAN LAKES OF THE NORTH MANCELONA (C)(N)

The company will block all 1+ calls dialed to any rate center listed in Section A 2, preceding. (N)

## B. MONTHLY RATES: Within the Base Rate Area: <sup>1</sup> (C)

### Class of Service

|                         |         |     |
|-------------------------|---------|-----|
| Residence 1-Party Line  | \$22.55 | (I) |
| Business 1-Party Line   | \$27.11 | (I) |
| Private Branch Exchange | \$36.40 | (I) |

In addition to the MONTHLY RATES listed above, the LOCAL MOU RATES in Section C. apply. (N)

<sup>1</sup> Basic local exchange service installed after December 31, 2001, will include touchcall service at no additional charge above the rates listed for the class of service installed. Residence 1-Party Line, Business 1-Party Line and Private Branch Exchange lines in service at January 1, 2002, that did not have touchcall service as an auxiliary service at the end of business December 31, 2001 will receive a monthly credit of \$1.25 during the period that line is in continual service after December 31, 2001 and touchcall service is not affirmatively added as an auxiliary service. If an end user's actions cause the disconnection of a line for any reason (such as nonpayment of a bill for regulated services, change of class of service or movement to vacation rate) that line will not qualify for any future touchcall service credit. (C)

(D)

(D)

<sup>3</sup> EDUCATIONAL CREDIT A \$2.50 credit applies for each Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service provided to a public school. (C)

(C)

<sup>4</sup> BUSINESS MULTI-LINE CREDIT A \$2.50 credit applies for Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service over six (6) (combined Private Branch Exchange and Business 1-Party Line services) provided to the same location and billed on the same bill. (C)

(C)

<sup>5</sup> If both the EDUCATIONAL CREDIT and the BUSINESS MULTI-LINE CREDIT could apply, only the EDUCATIONAL CREDIT would apply. In this case, the BUSINESS MULTI-LINE CREDIT would not apply.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

Original Sheet No. 5.2.2

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: ALBA

## C LOCAL MOU RATES

1. This charge applies in addition to the MONTHLY RATES listed in Section B, preceding.
2. For non 1+ and 0+ calls dialed to a station bearing the rate center designation of ALBA or LAKES OF THE NORTH, the Company will charge the following:

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period | \$0.00 per MOU |
|---|----------------|

|   |                |
|---|----------------|
| Each Conversation MOU over 2,000 in that billing period | \$0.00 per MOU |
|---|----------------|

3. For non 1+ and 0+ call dialed to a station within the Local Calling Area, but not to a station bearing the rate center designation of ALBA nor LAKES OF THE NORTH, the Company will charge the following:

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period | \$0.00 per MOU |
|---|----------------|

|   |                |
|---|----------------|
| Each Conversation MOU over 2,000 in that billing period | \$0.05 per MOU |
|---|----------------|

4. The Company will measure Conversation MOU from the time the Company's switching equipment receives answer supervision to the earlier of when the Company's switch receives disconnection supervision from itself or from the terminating switch.
5. The Company will measure Conversation MOU to the next higher whole MOU per call.
6. The Company will not bill the end user for non-conversation time related to local calls.
7. Conversation MOU do not include 0-plus or 0-minus calls.
8. The Company will not provide call record detail for local usage as part of its LOCAL TELEPHONE EXCHANGE SERVICE.
9. No MOU are carried forward from month to month.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

4th Revised Sheet No. 5.3  
Cancels 3rd Revised Sheet No. 5.3

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: LAKES OF THE NORTH (C)

## A GENERAL

1. The provision of service at the rates shown below is subject to the regulations given in the General Rules and Regulations as they now exist and are filed with and form part of this tariff.
2. The rates shown in Section B and C, following, entitle the customer to local calling to all stations bearing the designation of the following rates centers, which comprise the Local Calling Area: (C)

ALBA GAYLORD GRAYLING LAKES OF THE NORTH MANCELONA MANISTEE RIVER (C)(N)

The company will block all 1+ calls dialed to any rate center listed in Section A 2, preceding. (N)

## B. MONTHLY RATES: Within the Base Rate Area: <sup>1</sup> (C)

| Class of Service        |         |     |
|-------------------------|---------|-----|
| Residence 1-Party Line  | \$22.55 | (I) |
| Business 1-Party Line   | \$27.11 | (I) |
| Private Branch Exchange | \$36.40 | (I) |

In addition to the MONTHLY RATES listed above, the LOCAL MOU RATES in Section C. apply. (N)

<sup>1</sup> Basic local exchange service installed after December 31, 2001, will include touchcall service at no additional charge above the rates listed for the class of service installed. Residence 1-Party Line, Business 1-Party Line and Private Branch Exchange lines in service at January 1, 2002, that did not have touchcall service as an auxiliary service at the end of business December 31, 2001 will receive a monthly credit of \$1.25 during the period that line is in continual service after December 31, 2001 and touchcall service is not affirmatively added as an auxiliary service. If an end user's actions cause the disconnection of a line for any reason (such as nonpayment of a bill for regulated services, change of class of service or movement to vacation rate) that line will not qualify for any future touchcall service credit. (C)

(D)

(D)

<sup>3</sup> EDUCATIONAL CREDIT A \$2.50 credit applies for each Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service provided to a public school. (C)

(C)

<sup>4</sup> BUSINESS MULTI-LINE CREDIT A \$2.50 credit applies for Private Branch Exchange or Business 1-Party Line Local Telephone Exchange Service over six (6) (combined Private Branch Exchange and Business 1-Party Line services) provided to the same location and billed on the same bill. (C)

(C)

(C)

<sup>5</sup> If both the EDUCATIONAL CREDIT and the BUSINESS MULTI-LINE CREDIT could apply, only the EDUCATIONAL CREDIT would apply. In this case, the BUSINESS MULTI-LINE CREDIT would not apply.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 1(R)

Original Sheet No. 5.3.2

# LOCAL TELEPHONE EXCHANGE SERVICE

Exchange: LAKES OF THE NORTH

## C LOCAL MOU RATES

1. This charge applies in addition to the MONTHLY RATES listed in Section B, preceding.
2. For non 1+ and 0+ calls dialed to a station bearing the rate center designation of LAKES OF THE NORTH or ALBA, the Company will charge the following:
 

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period     | \$0.00 per MOU |
| Each Conversation MOU over 2,000 in that billing period | \$0.00 per MOU |
3. For non 1+ and 0+ call dialed to a station within the Local Calling Area, but not to a station bearing the rate center designation of LAKES OF THE NORTH nor ALBA, the Company will charge the following:
 

|   |                |
|---|----------------|
| First 2,000 Conversation MOU in each billing period     | \$0.00 per MOU |
| Each Conversation MOU over 2,000 in that billing period | \$0.05 per MOU |
4. The Company will measure Conversation MOU from the time the Company's switching equipment receives answer supervision to the earlier of when the Company's switch receives disconnection supervision from itself or from the terminating switch.
5. The Company will measure Conversation MOU to the next higher whole MOU per call.
6. The Company will not bill the end user for non-conversation time related to local calls.
7. Conversation MOU do not include 0-plus or 0-minus calls.
8. The Company will not provide call record detail for local usage as part of its LOCAL TELEPHONE EXCHANGE SERVICE.
9. No MOU are carried forward from month to month.

Issued: October 4, 2004

Effective: October 5, 2004

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

By: Edwin H. Eichler, President

Pigeon, Michigan



Pigeon Telephone Company  
M.P.S.C. No. 1 (R)

Original Sheet No. 7.1

LOCAL TELEPHONE EXCHANGE SERVICE  
SERVICE CONNECTION CHARGES

B. SERVICE CHARGES

1. Service Ordering Charge

a. Initial Service Order, Per Order

Applies to any new customer's service order. \$ 14.00

b. Subsequent Service Order, Per Order

Applies to any present customer's order to relocate,  
install, change or add to the service; restoral of  
service after disconnect for nonpayment; additional  
central lines, et cetera. 5.00

2. Line Connection Charge

Per Line 5.00

Issued: March 18, 1993

Effective: March 22, 1993

Issued under the authority of the Michigan Public Service Commission Order  
dated December 22, 1992, Case No. U-10064.

By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
Tariff M.P.S.C. No. 1 (R)

7th Revised Sheet No. 17  
Cancels 6th Revised Sheet No. 17

## LOCAL TELEPHONE EXCHANGE SERVICE

### LIFELINE SERVICE

#### A. DESCRIPTION

1. Lifeline Service applies discounts to monthly recurring rates for qualifying residential customers. These discounts are applied to existing tariffed rates and charges for residential telephone service.
2. In order to be eligible for Lifeline Service a residential customer's household income must be at or below 150% of the poverty level as determined by the United States Office of Management and Budget and as approved by the State Treasurer or the customer must participate in one of the following federal assistance programs:
  - a. Medicaid
  - b. Food stamps
  - c. Supplemental security income
  - d. Federal public housing assistance
  - e. Low-income home energy assistance program
  - f. National school lunch program's free lunch program
  - g. Temporary assistance for needy families.
3. Lifeline Service includes the services and functionalities enumerated in by the F.C.C. as follows: voice grade access to the public switched network; local usage; dual tone multi-frequency signaling or its functional equivalent; single-party service or its functional equivalent; access to operator services; access to interexchange service; access to directory assistance; and toll blocking for qualifying customers.
4. Other services can be provided with the Lifeline Service at applicable rates and charges.

#### B. REGULATIONS

1. Regulations specified elsewhere in the Company's tariffs apply to Lifeline Service.
2. Lifeline Service is available only with residence services, excluding foreign exchange service. Lifeline Service is limited to one line per household at the customer's primary residence.
3. A miscellaneous service charge does not apply when Lifeline Service is added or discontinued to existing service when that is the only work being done.
4.
  - a. A discount of 20% of the Basic Local Exchange rate or \$11.25, whichever is greater, on the monthly rate for Basic Local Exchange Service for Lifeline customers is applicable. For Lifeline customers 65 years of age or more, the discount will be 25% of the Basic Local Exchange rate or \$12.35, whichever is greater. The total discount shall not exceed 100% of all end-user common line charges and the Basic Local Exchange rate.
  - b. The credit will be applied in the following order: (1) The Interstate End User Access Charge, National Exchange Carriers Association, Inc. Tariff F.C.C. No. 5, Access Service. (2) The balance of the credit, if any, will be applied as a credit to the Basic Local Exchange rate. (D)
  - c. The Company will provide, at the qualifying customer's option, toll blocking service at no charge. The Company defines toll blocking as a service provided by the Company that lets the customer elect not to allow the completion of outgoing toll calls from their telecommunications channel.
  - d. The Company will not require a service deposit in order to initiate Lifeline Service if the qualifying customer voluntarily elects toll blocking service.
  - e. The Company will not disconnect Lifeline Service for non-payment of toll charges by qualifying customers.
5. The Lifeline plan will apply after receipt and processing of a completed Company or community/government provided application, including documentation indicating that the household income meets the eligibility standards established above.
6. Customers of Lifeline Service must notify the Company of any changes which would affect qualification. Reverification of eligibility will take place on an ongoing basis. When the customer is no longer eligible for Lifeline service, the Lifeline discount would be discontinued and regular tariff rates and charges would apply.

Issued: June 2, 2014

Effective: June 3, 2014

Issued under the authority of the PA 179, Michigan Telecommunications Act, as amended.

Edwin Eichler, President, Pigeon Telephone Company, 20 S. Main Street, Pigeon, MI 48755, 989-453-4321, csr@ptelmail.com

Pigeon Telephone Company  
Tariff M.P.S.C. No. 1 (R)

2nd Revised Sheet No. 17.1  
Cancels 1<sup>st</sup> Revised Sheet No. 17.1

LOCAL TELEPHONE EXCHANGE SERVICE

LIFELINE SERVICE

C. MONTHLY RATE FOR NON LIFELINE CUSTOMERS

A rate specified in MECA's Tariff M.P.S.C No. 25 Part XVII, Section 17.1.2.1 applies per exchange access line to cover the costs of the Lifeline service, to the Telephone Company intrastate services as listed below:

- Business and Residence exchange services excluding Lifeline customers.
- PBX Trunk Services
- Centrex Services

The rate for business Centrex station lines will be computed based on the trunk Equivalence Table specified in the Company's Tariff M.P.S.C. No. 2.

(D)

(D)

Pigeon Telephone Company  
M.P.S.C. No. 1R

Original Sheet No. 18

#### FEDERAL PROGRAMS

##### 1. UNIVERSAL SERVICE SUPPORT FOR LIBRARIES AND SCHOOLS

1. In accordance with 1997 PA 95 of the Michigan Telecommunications Act, and 47 CFR 54.500 *et. seq.*, eligible elementary and secondary schools shall receive intrastate services at discounts equal to the discounts applicable for eligible interstate services if the Company receives federal universal support for such telecommunication services.
2. In accordance with 1997 PA 96 of the Michigan Telecommunications Act, and 47 CFR 54.500 *et seq.*, eligible libraries shall receive intrastate services at discounts equal to the discounts applicable for eligible interstate services if the Company receives federal universal support for such telecommunication services.
3. Eligibility for discounts shall be determined in accordance with 47 CFR 54.500 *et seq.*

##### 2. UNIVERSAL SERVICE SUPPORT FOR HEALTH CARE PROVIDERS

1. In accordance with 47 CFR 54.601 *et. seq.*, the Company shall offer services to eligible health care providers to the extent that facilities and services are available.
2. Eligibility qualifications, provider selection, etc. shall be determined in accordance with 47 CFR 54.601 *et. seq.*
3. Services to eligible health care providers at reduced rates will be offered in accordance with 47 CFR 54.601 *et. seq.*
4. Reduced rates to eligible health care providers are available only to the extent that adequate funding is available from the federal universal support fund.

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By: Edwin H. Eichler, President

Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 31R

Original Sheet No. 7

PRIMARY BASIC LOCAL EXCHANGE SERVICE  
EXCHANGE - PIGEON

A. PRIMARY BASIC LOCAL EXCHANGE SERVICE CALLING AREA

The Primary Basic Local Exchange Service calling area consists of the following exchanges:

|           |        |          |           |          |
|-----------|--------|----------|-----------|----------|
| PIGEON    | ELKTON | OWENDALE | SEBEWAING | BAY PORT |
| CASEVILLE |        |          |           |          |

B. LOCAL CALLING AREA

The Local Calling Area associated with Primary Basic Local Exchange Service includes only the following exchanges:

|           |            |           |           |             |
|-----------|------------|-----------|-----------|-------------|
| BAD AXE   | BAY PORT   | CASEVILLE | CASS CITY | ELKTON      |
| GAGETOWN  | KINDE      | OWENDALE  | PIGEON    | PORT AUSTIN |
| SEBEWAING | UNIONVILLE |           |           |             |

The company will block all 1+ calls dialed to any rate center listed in the preceding.

C. RATE

|                          |         |
|--------------------------|---------|
| a. Monthly Recurring     | \$20.85 |
| b. Per Local Call Rate   | 0.146   |
| c. Per Local Minute Rate | 0.05*   |

MICHIGAN PUBLIC  
SERVICE COMMISSION  
MAR 27 2006  
FILED

\* This rate not regulated by the M.P.S.C.

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Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 31R

Original Sheet No. 8

PRIMARY BASIC LOCAL EXCHANGE SERVICE  
EXCHANGE - TWINING

A. PRIMARY BASIC LOCAL EXCHANGE SERVICE CALLING AREA

The Primary Basic Local Exchange Service calling area consists of the following exchanges:

TWINING AU GRES OMER PRESCOTT WHITTEMORE  
EAST TAWAS

B. LOCAL CALLING AREA

The Local Calling Area associated with Primary Basic Local Exchange Service includes only the following exchanges:

TWINING AU GRES OMER PRESCOTT WHITTEMORE  
EAST TAWAS

The company will block all 1+ calls dialed to any rate center listed in the preceding.

C. RATE

|                          |         |
|--------------------------|---------|
| a. Monthly Recurring     | \$20.85 |
| b. Per Local Call Rate   | 0.146   |
| c. Per Local Minute Rate | 0.05*   |

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Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 31R

Original Sheet No. 9

PRIMARY BASIC LOCAL EXCHANGE SERVICE

EXCHANGE - ALBA

A. PRIMARY BASIC LOCAL EXCHANGE SERVICE CALLING AREA

The Primary Basic Local Exchange Service calling area consists of the following exchanges:

|           |          |             |                    |
|-----------|----------|-------------|--------------------|
| ALBA      | ELMIRA   | GAYLORD     | LAKES OF THE NORTH |
| MANCELONA | BELLAIRE | EAST JORDAN |                    |

B. LOCAL CALLING AREA

The Local Calling Area associated with Primary Basic Local Exchange Service includes only the following exchanges:

|           |          |             |                    |
|-----------|----------|-------------|--------------------|
| ALBA      | ELMIRA   | GAYLORD     | LAKES OF THE NORTH |
| MANCELONA | BELLAIRE | EAST JORDAN |                    |

The company will block all 1+ calls dialed to any rate center listed in the preceding.

C. RATE

|                          |         |
|--------------------------|---------|
| a. Monthly Recurring     | \$20.85 |
| b. Per Local Call Rate   | 0.146   |
| c. Per Local Minute Rate | 0.05*   |

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Pigeon, Michigan

Pigeon Telephone Company  
M.P.S.C. No. 31R

Original Sheet No. 10

PRIMARY BASIC LOCAL EXCHANGE SERVICE

EXCHANGE – LAKES OF THE NORTH

A. PRIMARY BASIC LOCAL EXCHANGE SERVICE CALLING AREA

The Primary Basic Local Exchange Service calling area consists of the following exchanges:

|                    |         |          |                |
|--------------------|---------|----------|----------------|
| LAKES OF THE NORTH | GAYLORD | GRAYLING | MANISTEE RIVER |
| MANCELONA          | ALBA    |          |                |

B. LOCAL CALLING AREA

The Local Calling Area associated with Primary Basic Local Exchange Service includes only the following exchanges:

|                    |         |          |                |
|--------------------|---------|----------|----------------|
| LAKES OF THE NORTH | GAYLORD | GRAYLING | MANISTEE RIVER |
| MANCELONA          | ALBA    |          |                |

The company will block all 1+ calls dialed to any rate center listed in the preceding.

C. RATE

|                          |         |
|--------------------------|---------|
| a. Monthly Recurring     | \$20.85 |
| b. Per Local Call Rate   | 0.146   |
| c. Per Local Minute Rate | 0.05*   |

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Pigeon, Michigan



Pigeon Telephone Company  
M.P.S.C. No. 31R

Original Sheet No. 11.1

PRIMARY BASIC LOCAL EXCHANGE SERVICE  
SERVICE CONNECTION CHARGES

B. SERVICE CHARGES

1. Service Ordering Charge

a. Initial Service Order, Per PBLES Order

Applies to any new PBLES customer's service order. \$ 14.00

b. Subsequent Service Order, Per PBLES Order

Applies to any present PBLES customer's order to relocate, install, change or add to the service; restoral of service after disconnect for nonpayment; et cetera. 5.00

2. Line Connection Charge

Per PBLES Line 5.00

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Pigeon, Michigan

**Pigeon Telephone Company (SAC 310721)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Pigeon Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**Pigeon Telephone Company (SAC 310721)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Pigeon Telephone Company did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**